

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

MAY 3 1 2007

Docket No.: R3-07-NOV-RCRA-024

VIA FEDEX

Mr. John Campbell, Director NASA Wallops Island Mill Dam Road Wallops Island, VA 23337

Re: Notice of Violation

Compliance Evaluation Inspection February 27, 2007 EPA ID No. VA8800010763

Dear Mr. Campbell:

On February 27, 2007, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") of your facility in Wallops Island, VA. under the federally authorized Commonwealth of Virginia Hazardous Waste Management Regulations ("VAHWMR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. The Inspection Report is attached to this letter. Based on the inspection, EPA has determined that the National Aeronautics and Space Administration (NASA or the Facility) has violated regulations under VAHWMR and RCRA. As a result of this determination, EPA is issuing this Notice of Violation ("NOV"). The specific violation(s) are:

- 1. The inspector noted the date on one container in building B29 had an illegible date marked on it in violation of 9 VAC 20-60-262 [40 CFR 262.34(a)(2)] which requires dates to be "clearly marked and visible for inspection".
- 2. The inspector observed both in building F16 (Photo #33) and the National Oceanic and Atmospheric Administration (NOAA) facility (Photo #48) containers of universal waste were not dated as required by 9 VAC 20-60-273 [40 CFR 273.15(c)(1)]. Production of shipping records to demonstrate the wastes were in storage less than a year does not meet the requirements for an inventory system allowed in 9 VAC 20-60-273 [40 CFR 273.15(c)(3&4)].

Within twenty (20) calendar days of the receipt of this NOV, please submit a response documenting the measures the Facility has taken or is taking to achieve compliance with the violations noted above or provide an explanation of facts and circumstances that cause you to

Customer Service Hotline: 1-800-438-2474

believe that EPA's determination of the alleged violations are in error. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed.

Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$32,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the one cited in this letter, or past violations in any future enforcement action. Response to this NOV shall be addressed to:

Kenneth J. Cox Waste and Chemicals Management Division (3WC31) U.S. Environmental Protection Agency - Region III 1650 Arch Street Philadelphia, PA 19103#

Harry T. Daw

Associate Director

Office of Enforcement

Waste and Chemicals Management Division

Enclosure

cc:

Steve Fraizier (VADEQ) with Enclosure Terry DiFiore (3WC31) w/o Enclosure Ken Cox (3WC31) w/o Enclosure

	CONCURRENCES													
SYMBOL	•	3WC31	3WC31											
SURNAME	•	Zigo C	Amend											
DATE	•	5125/07	5/25/01											

National Aeronautics and Space Administration

Goddard Space Flight CenterWallops Flight Facility
Wallops Island, VA 23337-5099



June 19, 2007

Reply to Attn of: 250.W

Waste and Chemicals Management Division (3WC31)
Attn: Mr. Kenneth J. Cox
Compliance Officer
U. S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Notice of Violation, Compliance Evaluation Inspection held

February 27, 2007, EPA ID No. VA8800010763,

Docket No.: R3-07-NOV-RCRA-024

Ref: EPA ltr. from H. Daw to J. Campbell, dtd. 5/31/07

The NASA Goddard Space Flight Center's Wallops Flight Facility (WFF) is in receipt of the United States Environmental Protection Agency's (EPA) Notice of Violation (NOV) dated May 31, 2007, from the inspection held on February 27 - March 1, 2007. In that letter, EPA cites two specific "violations" that WFF was able to immediately remediate during the inspection. The missing or illegible labels cited in the NOV were immediately corrected and records were presented to the inspector which demonstrated that the universal waste items were held for less than 1 year. NASA is confident that these findings and our subsequent best management practices will improve the environmental program at WFF.

As a result of your inspection, WFF will implement the following best management practices.

- NASA is reviewing the less-than-90-day accumulation area inspection requirements with its hazardous waste inspectors to ensure that particular attention is given to the legibility of hazardous waste labels.
- NASA will review the contents of this NOV with all WFF satellite accumulation area point-of-contact personnel by June 30, 2007. All findings from the EPA inspection will be incorporated into successive hazardous waste training sessions.
- The National Oceanic and Atmospheric Administration (NOAA) has affixed a
 metal plate to the wooden crate housing the universal waste fluorescent tubes
 (Enclosure 1). This plate will provide a more adherent surface on which to
 bond the accumulation start date labels.

 NASA will instruct its building inspectors to examine both hazardous waste labels and universal waste accumulation start date labels for legibility, completeness, and start date expiration. Accumulation start dates in excess of 9 months will be reported to the hazardous waste manager.

The May 31, 2007, letter referenced previously indicates that WFF should "provide an explanation of facts and circumstances that cause [it] to believe that EPA's determination of the alleged violations [were] in error." Although WFF does not dispute that there were minor errors uncovered during the inspection, it respectfully submits that the facts and circumstances associated with the alleged violations are such that the NOV dated May 31, 2007, should be removed from WFF's permanent record. A brief explanation of those facts and circumstances follows.

The first violation refers to a container in Building B-29 with an illegible date. The inspector's report states, "The date on one label was illegible but that was corrected immediately." NASA believes that the label could be read well enough to be corrected immediately; therefore, the dates were clearly marked and visible for inspection in accordance with 40 CFR 262.34(a)(2). However, this cannot be confirmed because this discrepancy was not highlighted or photographed during the inspection.

The second violation concerns universal waste labels with questionable accumulation start dates at two different locations. In one instance, the universal waste container at the NOAA facility lacked an accumulation start date. This container had been properly labeled with a dated adhesive sticker, but humid and dusty conditions associated with construction activities caused the sticker to peel away from the wooden crate. It is suspected that cleaning personnel mistakenly swept up the label.

In the second instance a universal waste label on a container in Building F-16 was dated with an accumulation start date of February 8, 2006. Discussions with operating personnel revealed that this date should have been February 8, 2007. However, the operator inadvertently wrote the year 2006 instead of 2007.

In both cases, the WFF Hazardous Waste Manager was able to satisfy the EPA inspector that the universal waste had not accumulated for greater than 1 year. Documentation, through the use of shipping records and hazardous waste disposal inventory forms (Enclosure 2), validated the proper universal start date. As a small quantity handler of universal waste, WFF submits that Enclosure 2 demonstrates that WFF complied with the requirements of 40 CFR 273.15.

NASA will consistently strive to improve its waste management practices through cooperative guidance offered by EPA.

If you should have any questions or require further clarification, please contact Mr. Joel T. Mitchell at (757) 824-1127.

John H. Campbell

Director of Wallops Flight Facility

2 Enclosures

cc: (w/o encl.) 140/Mr. D. Hymer 200/Ms. C. Masey 250/Mr. A. Lopez

HQ/Environmental Management Division/Mr. J. Leatherwood

NOAA/Mr. V. Crawford

DEQ/Ms. L. Silvia



Enclosure 1

EPA Hazardous Waste Inspection February 27 – March 1, 2007

NASA is confident that the universal waste fluorescent tubes at the National Oceanic and Atmospheric Administration (NOAA) facility and the universal waste batteries at Building F-16 observed by the United States Environmental Protection Agency (EPA) inspector on February 27, 2007, were on site for less than one year.

On October 12, 2006, fluorescent tubes were picked up from NOAA by Wallops Flight Facility (WFF) personnel. According to Attachment 1, the tubes were packed in two tube boxes and one rectangular box. On November 7, 2006, these tubes were transported to Veolia ES Technical Solutions, Philadelphia, Pennsylvania, by Dart Trucking for bulking, prior to recycling, as stated on shipping document ZZ00033353, line 2 and line 3. (Attachment 2). The packing summary (Attachment 3), for line 2 and line 3, describes the containers types as "4-Foot-DF" and "301G-DF," respectively. These container types are consistent with the two tube boxes and one rectangular box described above.

Since NOAA has one universal waste site for fluorescent tubes, the accumulation start date on the NOAA container discussed in the second violation of the Notice of Violation (NOV) would be no earlier than October 12, 2006.

The universal waste battery container observed at Building F-16 was emptied by WFF personnel on November 24, 2006, (Attachment 4) and February 8, 2007, (Attachment 5). The lead acid batteries from these containers were transported by Dart Trucking on January 23, 2007, via shipping document ZZ00032905 (Attachment 6) and on April 10, 2007, via shipping document ZZ00033317 (Attachment 7), respectively. In both cases the lead acid batteries were delivered to Veolia ES Technical Solutions, Philadelphia, Pennsylvania, for bulking prior to recycling. The nickel cadmium batteries will leave WFF on June 26, 2007.

Therefore, the accumulation start date on the Building F-16 container discussed in the second violation of the Notice of Violation (NOV) would be no earlier than February 8, 2007. The February 8, 2006, date observed on the container was written in error in much the same way as one often misdates the year on checks at the beginning of the year.

Regulation 9 VAC 20-60-273 [40 CFR 273.15(c)(6)] allows for "any other method which clearly demonstrates the length of time that universal waste has been accumulated from the date it becomes a waste or is received." Thus, the universal waste fluorescent tubes observed by the EPA inspector on February 27, 2007, could not have been accumulated prior to October 12, 2006 and the universal waste batteries observed by the EPA inspector on February 27, 2007, could not have been accumulated prior to February 8, 2007. In both cases, hazardous waste disposal inventory forms, packing lists, and shipping records document that the universal waste had not accumulated for greater than one year.

HAZARDOUS WASTE DISPOSAL INVENTORY Site: Greenbelt | Wallops Main Base (EPA ID# VA88800010763) Wallops Island (EPA ID# VA78000020888) **GENERATOR INFORMATION** Date: Sheet 1. Containers shall be COMPATIBLE. 2. Containers shall be CLOSED. Name: Frostrom Code Containers shal be LABELED. Phone Blda. Room 4. Waste materials shall NOT be mixed. WASTE INVENTORY **GENERATING PROCESS** STATE CONTAINERS WASTE DESCRIPTION **WASTE TRAIT** Describe the work process that Type — Describe type, e.g., drum, Check appropriate ITEM Describe material to be collected by its specific chemical Insert appropriate code. made the waste, e.g., expired shelf plastic bottle, sealed bucket, etc. block. constituents or by trade name. life, cleaning paint brushes. No. Size Type Gas Liq Solid Trait Code Flowscent tubes U CA -- Corrosive Acid 四 (pH<2)CB - Corrosive Base 3. (pH>12.5)F – Flammable 4. (Flashpoint 5. < 140F) NR - Non-Regulated 6. Ox - Oxidizer Px - Peroxide 7. R - Reactive (H2O, air. 8. or otherwise sensitive) T - Toxic 9. Other (Specify) 10. 11. П П 12. **Environmental Office Use GENERATOR COMMENTS**

GENERATOR CERTIFICATION

I hereby declare that the contents of	f this inventory are fully and accurate	ly stated as deseribed b	their waste, process, ar	nd container parameters.
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At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233. At Wallops, when ready for pickup, e-mail completed form to wffnazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.

GSFC 23-54 (2/04) ALL PREVIOUS EDITIONS ARE OBSOLETE

Printed Name Trag trostrom Signature





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Allachment 2

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CONDX ENVIRONMENTAL SERVICES

PACKING SUMMARY

Generator Number: 437550

Manifest Number:

ZZ00033353

NASA/GSFC WALLDPS FLIGHT FACIL

Field System (D:

MAIN BASE FACILITY

Wark Order Number: 0743640004

WALLOPS ISLAND, VA. 23337 Attn: MARIANNE SIMKO(CONTACT/SARER®ATELLE CONTACT/SARER®ATELLE CONTACT/S Date Shipped

11/06/2006

EF 4.1D: VA8800010763

Co ner#: PS-0743540004-003

Viveste Area:

Manifest Page/Line: 01 / 1

Vv. 402477 DispossiCode: GRT247364FA

PhiV State: 9

Date Accumulated: 11/08/2936**

Gen Drum ID:

Shipping Name: BARTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 9, UN2795, III.

Outer Container: 381G-DF

No. of Commons?" 01

Primary Waste Codes: NONE

PCB Serial #:

OOS Care: 7 1

Total Crins Wit 240, S. SIC: 9581 Source: G16 Form: W909 System: H141 Cubic Ft: 4.09

Individual Common Weights: 1 @ 248 (FOUNDS)

Container Size - Net Weight

Chamical Name EPA/State Codes

SG GAL

NICKEL CADMIUM BATTERIES (100%)

NONE

Contained#: FS-0743540004-091

Waste Anear

Manifest PagerLine: 01 / 2

VMP: 555859

DisposalCode: GRT247434PA

PHY State: S

Este Ascumulated: 11/06/2006

Gen Drum ID.

Shipping Name: FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE

Ourer Container: 4 FOOT-DF

Inner Container:

No. of Commons: 62 Frimary Waste Codes: MONE

PCB Serial #:

OOS Date: 1 !

Total Crins Vib. 118 SIC: 3661 Source: G11 Form: VG19 System: H016 Cubic Pt.: 5.00

Individual Common Vieignta:

55, 55 (POUNDS)

Units Container Size

Net Weight Chemical Name FLUCRESCENT LAMP TUBES (100%)

Maste Area:

EPA/State Codes NONE

J 540W

Mamilest Page/Line: 01 / S

Container# PS-0749540004-602

WIF: 555660 EleccelCode: GRT247434PA-U

PHY State: S

Date Accumulated: 11/88/2868

Gan Drum ID.

Shisping Mane: FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE

Outer Container: 301G-DF Inner Container.

No. of Commons: 91

Primsny Waste Codes: NONE

PCB Serial #

OOS Date: //

Total Crims WE 25 SIC. 9667 Source: G11 Forms VV319 System: HG10 Cubic Ft.: 6 00

Individual Common Weights:

! ② 25 (POUNDS)

Chemical Name

EPA/State Codes

33 GAL

Units Container Size

Net Weight

FLUORESCENT LAMP TUBES (100%)

NOME

Manifest Number: ZZ000333353

Work Order Wumber: 0748646004

Page 1 of 1

HAZARDOUS WASTE DISPOSAL INVENTORY

Site:	Greenbelt Wallops Main Base (EPA ID# VA888	GENERATOR INFO		PÀ ID# VA780	000020888)			Sec. 25.54		
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		life, cleaning paint brushes.	No.	Size	Туре	Gas	Liq	Solid	Trait	Code
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3.	Total City for Action		6						CATINA	(pH>12.5)
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6										NR – Non-Regulated Ox – Oxidizer
7										Px - Peroxide
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10).									Other (Specify)
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12	2.									
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	ve you received Resource Conservation and Recovery Ac ve you made a good faith effort to minimize your waste ge			No No	100000	Date received: 11/24/04 Date collected: 11/24/04				
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At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233. At Wallops, when ready for pickup, e-mail completed form to wffnazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.

HAZARDOUS WASTE DISPOSAL INVENTORY

	Site. V	Greenbelt Wallops Main Base (EPA ID# VA88	GENERATOR INFO	Access to the second se	PA ID# VA780 V TION	00002088)	Ц	100			
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	GENERATOR COMMENTS									nental	Office Use
	Have you received Resource Conservation and Recovery Act (RCRA) generator training within the last 12 months? Have you made a good faith effort to minimize your waste generation by considering substitutes or alternatives?									ed: 2	18/07
	Comments. Indicate special requirements (if any) for collection of the waste material, e.g., restricted access to an area, appointment needed, generator wishes to monitor collection, etc. Date collected: Z Initials:										
			GENERATOR CE	RTIF	ICATION			354			
	I her	eby declare that the contents of this inventory are fully	and accurately stated as describe	d by thei	r waste, proce	ess, and cont	ainer p	arame	ters.		
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At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233. At Wallops, when ready for pickup, e-mail completed form to wffhazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.





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	17	. Transporter Acknowledgment	of Receipt of Shipment		8:			,		Month	Day Voor
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ANSI	Tra	ansporter 2 Printed/Typed Nam			Signa	ture	· · ·	/^		Month	Day Year
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1	⊢	a. Discrepancy Indication Space	e Ouantity	Туре		Residue		Partial Rejec	rtion		ull Rejection
			Quantity	Т		L Residue		rantai Rejec	CHOIT		un Rejection
<u> </u>	18	b. Alternate Facility (or General	tor)			Shipping Document	Tracking Nur	mber: U.S. EPA ID Nu	ımber		
CILI		, (,								
D FA		cility's Phone: c. Signature of Alternate Facility	/ (or Generator)							Month	Day Year
IATE	10	c. Signature of Alternate Facility	(or Generator)							l l	Day Teal
DESIGNATED FACILITY	19.	. Report Management Method (Codes (i.e., codes for treatment, disp	osal, and recycling system							
핌	1.		2.		3.			4.			
	20.	Designated Facility Owner or 0	Dperator: Certification of receipt of st	hipment except as noted in	Item 18a				_		
\downarrow	Pri	Ceame	E 6004	SR.	Signat	June	u i	Eld	01/1	1. 101	Day Year 23 07
	_							,	MATED		GENERATOR





DODO_MOMENT	Generator's Name and Mailing Address NASA/GSFC WALLOPS FUGHT FAC MAIN BASE FACIUTY SLDG F180 MAIL CODE 250.W WALLOPS ISLAND, VA 23337 Jenerator's Phone 757 / 1/24-2127 Transporter 1 Company Name GRIT TRUCKING COMPANY, INC.	,	0003331	1
ASA-SEC_VALLOPS FLIGHT FAC Centerator's Priore** To 224-21.27 SAME Contention's Priore** SAME Contention's Pri	NASA/GSFC WALLOPS FUGHT FAC MAIN BASE FACULTY SAME SLDG F180 MAIL CODE 250.W WALLOPS ISLAND, VA 23337 Itenerator's Phone 757 B24-2127 Transporter 1 Company Name ART TRUCKING COMPANY, INC.	,		
B. Terraporter Company Name	Transporter 1 Company Name PRITIFUCHING COMPANY, INC.	II S EDA ID Number		
Transporter 2 Company Name 3. Designated Facility Name and Site Address COLIA ES TECHNICAL SOLUTIONS. L.C. L.C. L.C. L.C. S103 HEDLEY STREET Facilitys Phone: 900 423-2392 PHLADELPHIA, PA 19137 a. 90. U.S. DOT Description including Proper Shipping Name, Hazard Class, ID Number, H.M. and Pacifing Goous (#any) NO. 7/990 Quantity NO. 7/990 Quantity NO. 7/990 Quantity NO. 1. Treat 12. U.R. 13. Codes NO. 1. Treat 14. Special Handling Instructions and Additional Information NONE ALKAUNE BATTERES, DOT NON-REGULATED, NONE. 14. Special Handling Instructions and Additional Information NONE 3. 14. Special Handling Instructions and Additional Information 1) ERG: 154 A GRT1247361PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. 3 LOB HESSLEY St. Plus A. GRT1247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L NFOTRAC ACCOUNT #368072 By C. 4 HILD 2 H. Local A. GRT1247365PA LEAD ACID BATT 2) AGRT247365PA DRYCELL BATT-L N			0 8 8 5 8 7	
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Facility's Phone: 930 423-2362 PHILADELPHIA, PA 19137	LL.C. 'S TECHNICAL SOLUTIONS.	U.S. EFA ID NUMBER		
By By U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (I any)) By U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (I any)) W. ALFIERES, WET, FILLED WITH ACID, S. UN2794, III D. D. 4. C. F. D. 3.5.0.0. P. NONE ALFALINE BATTERSES, DOT NON-REGULATED, NONE. NONE ALFALINE BATTERSES, DOT NON-REGULATED, NONE. NONE ALFALINE BATTERSES, DOT NON-REGULATED, NONE. NONE D. D. 1. D. F. D. 2.4.0. P. NONE NONE ALFALINE BATTERSES, DOT NON-REGULATED, NONE. NONE D. D. 1. D. F. D. 2.4.0. P. D.	poor was associated ADELPHIA PA 19137	PADSE	1 9 4 5 1 5	7
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Generator's/Offeror's Printed/Typed Name Comparison of Signature	*OTRAC ACCOUNT #88072	L	Sy ESS	y
Generator's/Offeror's Printed/Typed Name Comparison of Signature	Bec's 4/11/07 At Neolia 3100 Hesley st. Anila Pal	19137 P	eague Ele	-07
Generator's/Offeror's Printed/Typed Name Comparison of Signature	GENERATOR S/OFFEROR S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental	the proper shipping na if regulations.	me, and are classified, packa	ged,
Transporter 2 Printed/Typed Name Signature Signa				
Transporter signature (for exports only): Export from U.S. Port of entry/exit:		Wil	h a l n	Year
Transporter Acknowledgment of Receipt of Shipment Transporter 1 Printed/Typed Name Signature Month Day	International Shipments			
18. Discrepancy 18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection Shipping Document Tracking Number:	Transporter Acknowledgment of Receipt of Shipment			
18. Discrepancy 18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection Shipping Document Tracking Number:			Month Day	Year
18. Discrepancy 18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection Shipping Document Tracking Number:		:	Month Day	Year
Shipping Document Tracking Number:	Discrepancy			Ь
	. Discrepancy Indication Space Quantity Type Residue	Partial Rejection	Full Rejec	tion
18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone:	Shipping Document Tracking Number:	;		
Y Facility's Phone:	. Alternate Facility (or Generator) U.	.S. EPA ID Number		
18c. Signature of Alternate Facility (or Generator) Month Day	. Signature of Alternate Facility (or Generator)		Month Day	Year
19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)				
当 1. 3. 4.	2. 3.	4.		
20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a			¬ .1	
Printed-Typed Name Signature Signature		11	77 11 1	
$\forall 11 \ 0.2$		Len	Month Day 104110	Year